

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,) Case No. 4:20-CR-00212
DEBRA LYNN MERCER-ERWIN (1))
Defendants.)

**DEFENDANT DEBRA LYNN MERCER-ERWIN'S AMENDED MOTION TO JOIN
AND ADOPT DEFENDANT KAYLEIGH MOFFETT'S MOTION TO SUPPRESS AND
REQUEST FOR A FRANKS HEARING**

The Defendant, Debra Lynn Mercer-Erwin (the “Defendant”), through her attorney of record, Joe E. White, Jr., respectfully requests permission to join and adopt the law and argument raised in the Defendant Kayleigh Moffett’s Motion to Suppress and Request for a Franks Hearing (Dkt. # 324) (the “Motion to Suppress”).

CONCLUSION

In an effort to promote judicial economy and because the Defendant shares the arguments raised in the Motion to Suppress, the Defendant requests that she be allowed to join and adopt the law and argument raised by the Motion to Suppress.

Respectfully submitted,

s/ Joe E. White, Jr.

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CERTIFICATE OF DELIVERY

I hereby certify that on this 8th day of March, 2023, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing, which will automatically send e-mail notification of such filing to all attorneys of record.

s/ Joe E. White, Jr.
JOE E. WHITE, JR.

CERTIFICATE OF CONFERENCE

Pursuant to United States District Court for the Eastern District of Texas Local Rule CR-47(a)(3), on March 8, 2023, defense counsel for the Defendant Debra Mercer-Erwin has conferred with Ernest Gonzalez, Assistant United States Attorney in a good faith effort to resolve the matter without Court intervention and advise the Court that the United States opposes Defendant Kayleigh Moffett's Motion to Suppress and Request for a Franks Hearing (Dkt. #324) but does not oppose the Defendant Debra Mercer-Erwin's Motion to Adopt Defendant Kayleigh Moffett's Motion to Suppress and Request for a Franks Hearing (Dkt. #324.)

s/ Joe E. White, Jr.
JOE E. WHITE, JR.